

PERFORMANCE EVALUATIONS

OVERVIEW

In This Section

TOPIC	SEE PAGE:
INSTRUCTIONS FOR WRITING PUBLIC EVALUATIONS	G-1
PERFORMANCE EVALUATIONS Evaluation for Small Institution Evaluation for Large Retail Institution Evaluation for Wholesale and Limited-Purpose Institution Evaluation for Institutions with Strategic Plans	G-4 G-9 G-26 G-40
REFERENCES	G-52

INSTRUCTIONS FOR WRITING PUBLIC EVALUATIONS

The format of the public evaluation follows the provisions of amendments to the Community Reinvestment Act that require the agencies to:

- Rate the institution's overall performance in meeting the credit needs of its community
- Separately present the conclusions for each of the assessment factors the agencies considered in arriving at the rating as well as the facts and data supporting those conclusions for each metropolitan area in which the institution has branches
- For interstate institutions, rate each state or multistate MSA in which the institution has branches

The contents of the public evaluation will vary depending on the nature of the institution examined and the assessment method used.

Samples of public evaluations for small institutions, large institutions, wholesale and limited-purpose institutions, and institutions operating under an approved strategic plan have been prepared by the agencies. These samples provide guidance regarding the structure and contents of the public evaluations. Except for the public evaluation for small institutions, the sample evaluations are structured to meet the requirements that the CRA imposes on public evaluations for interstate institutions. However, the samples can easily be adjusted to suit the requirements for institutions with branches in only one state.

INSTRUCTIONS

Regardless of the assessment method used, the public evaluation for institutions

FOR WRITING PUBLIC EVALUATIONS (cont'd)

Evaluations for Institutions with Branches in Only One State

with branches in only one state must contain the institution's overall CRA rating and the conclusions for the performance test(s) upon which the rating is based. If the institution has branches in more than one MSA, the public evaluation must present the conclusions for each of the performance tests, along with supporting facts and data, separately for each MSA. If the institution has branches in non-MSA areas of the state, the conclusions, facts and data for those areas should also be presented.

More detailed discussions of each assessment area examined should follow the appropriate MSA and non-MSA presentation.

Evaluations for Interstate Institutions

In addition to the institution's overall CRA rating, the public evaluations for interstate institutions must contain ratings for each state and multistate MSA in which the institution has branches. The public evaluation for interstate institutions is, therefore, organized to present the institution's overall rating first, followed by state and multistate MSA ratings. The discussion of the overall institution, state, and multistate MSA ratings must discuss the conclusions for the performance test(s) upon which the rating is based.

Separate MSA presentations for each MSA where the institution has branches should follow the appropriate state presentation. If the institution has branches in non-MSA areas within the state, a discussion of the statewide non-MSA area should also be included. Again, more detailed assessment area discussions follow the applicable MSA and non-MSA discussions.

Multistate MSA presentations should also be followed by discussions of the assessment area (s) within the multistate MSA to the extent that they are smaller than the multistate MSA. If the institution has delineated the multistate MSA as its assessment area, the detailed presentation of the assessment area and the institution's operations and performance should be contained in the discussion of the multistate MSA.

Conclusions Based on Performance Tests

The statute requires the agencies to present conclusions for each of the assessment factors considered in arriving at a rating. Performance tests have replaced assessment factors as the analytical tools for assessing CRA performance. The performance evaluations should reflect the conclusions reached under these performance tests.

For large retail institutions, the public evaluation must indicate the conclusions reached under the lending, investment, and service tests. The streamlined assessment method for small institutions focuses on lending performance.

INSTRUCTIONS FOR WRITING PUBLIC

However, to the extent that investment and service performance were considered in rating a small institution "Outstanding", the conclusions for each must be placed in the public evaluation. Conclusions of the community development test must be

**EVALUATIONS
(cont'd)****Conclusions
Based on
Performance
Tests (cont'd)**

discussed for wholesale and limited-purpose institutions. Finally, institutions that operate under an approved strategic plan may be assessed under one or more of the lending, investment, and service tests, depending on the plan. The performance evaluation for those institutions must contain conclusions for the tests used in the examination.

**Hybrid
Performance
Evaluations**

Where an institution is examined under more than one assessment method, the examiner should develop a hybrid performance evaluation. The evaluation should state the assessment methods used in the General Information section. In addition, the discussion of the scope should indicate which method was used in each assessment area examined. Finally, discussions of the analysis used under each assessment area presentation should note the applicable assessment method.

**Use of Charts,
Tables and
Appendices**

Charts and tables should be used throughout the public evaluation to facilitate discussion of the institution's performance. In addition, the inclusion of one or more appendices may facilitate the presentation of information in the public evaluation. For instance, Example A of this section is a chart describing the scope of the examination and should be used for institutions with numerous assessment areas. Example B of this section should be used to summarize the state ratings for interstate institutions. Other charts and tables may be used to assist the reader and amplify the discussion of an institution's performance.

Sample Small Institution Evaluation ***PUBLIC DISCLOSURE**

(Date of Evaluation)

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION****Name of Depository Institution
Institution's Identification Number****Address of Institution****Name of Supervisory Agency****Address of Supervisory Agency**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

* This is a sample format created for an institution operating only in one assessment area in one state. It will be adjusted, as appropriate, to reflect the requirements of the IBBEA and each institution's operations.

TABLE OF CONTENTS

I.	General Information	1
II.	Institution Rating.....	1
	Overall Rating	1
III.	Description of Institution.....	3
IV.	Description of Assessment Area.....	3
V.	Conclusions	3

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of (**Name of depository institution**) prepared by (**Name of agency**), the institution's supervisory agency, as of (**date of examination**). The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

INSTITUTION'S CRA RATING: This institution is rated _____.

Summarize the major factors supporting the institution's rating. When illegal discrimination or discouragement has been identified, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

DESCRIPTION OF INSTITUTION

Write a brief description of the institution's ability to meet various credit needs based on its financial condition and size, product offerings, prior performance, legal impediments and other factors. Information that may be important includes:

- Relationships with a holding company and its affiliates
- Total assets
- Asset/loan portfolio mix
- Primary business focus
- Branch network
- Any merger or acquisition activity

DESCRIPTION OF (*Name of ASSESSMENT AREA*)

Describe the assessment area(s) under review by including appropriate information (and any trends) on the population, median income, employment including major employers, and community credit needs and business opportunities identified through outreach activities. Include, as appropriate, a discussion of the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA:

Discuss the institution's CRA performance. The facts, data and analysis that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the performance criteria were analyzed in order to rate the institution. In addition to the information provided on the core criteria, the performance evaluation should include information on qualified investments and the provision of services, if used to support an outstanding rating.

Write a paragraph about the institution's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) using the following guidelines.

When substantive violations involving illegal discrimination or discouragement have been found, state that substantive violations were found, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulations(s) violated, the extent of the violation(s) (for example, widespread, or limited to a particular office, division, or subsidiary) and characterize management's responsiveness in acting upon the issue(s). Mention whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices. State whether management has taken, or committed to take, corrective action particularly with respect to voluntary corrective action resulting from self-assessment(s).

If no substantive violations were found, state that no violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Even if discrimination has not been found, comments related to the institution's fair lending policies, procedures, training programs and internal assessment efforts may still be appropriate. If applicable, technical violations cited in the report of examination should be presented in general terms.

Sample Large Institution Evaluation ***PUBLIC DISCLOSURE**

(Date of Evaluation)

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION****Name of Depository Institution
Institution's Identification Number****Address of Institution****Name of Supervisory Agency****Address of Supervisory Agency**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

* This is a sample format created to reflect the requirements of the IBBEA for an institution operating in multiple assessment areas, in MSAs and in non-MSAs, in multiple states, including multistate MSAs. It will be adjusted, as appropriate, to reflect each institution's operations.

TABLE OF CONTENTS*

I.	General Information	1
II.	Institution Rating	
a.	Overall Rating.....	2
b.	Lending, Investment, Service Test Table	3
c.	Description of Institution	4
d.	Conclusions with Respect to Performance Tests.....	4
III.	Multistate Metropolitan Area	
a.	Multistate Metropolitan Area Rating.....	5
b.	Scope of Examination.....	5
c.	Description of Operations.....	5
d.	Conclusions with Respect to Performance Tests.....	6
IV.	State	
a.	Summary	
i.	State Rating.....	7
ii.	Scope of Examination	7
iii.	Description of Operations	7
iv.	Conclusions with Respect to Performance Tests	7
b.	Metropolitan Area (AAs reviewed using examination procedures)	
i.	Description of Operations	8
ii.	Conclusions with Respect to Performance Tests	8
c.	Metropolitan Area (AAs reviewed without examination procedures)	
i.	Description of Operations	9
ii.	Conclusions with Respect to Performance Tests	9
d.	Nonmetropolitan Statewide Area (AAs reviewed using examination procedures)	
i.	Description of Operations	10
ii.	Conclusions with Respect to Performance Tests	10
e.	Nonmetropolitan Statewide Area (AAs reviewed without examination procedures)	
i.	Description of Operations	11
ii.	Conclusions with Respect to Performance Tests	11
V.	Appendix	
a.	Scope of Examination.....	12
b.	Summary of State and Multistate Metropolitan Area Ratings.....	15

* This table of contents is a sample for a large, multistate institution, and should be adjusted, as appropriate, to reflect the scope of the institution's operations. Refer to the Instructions for Writing Public Evaluations for further guidance.

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of (**Name of depository institution**) prepared by (**Name of agency**), the institution's supervisory agency, as of (**date of examination**). The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

INSTITUTION

INSTITUTION'S CRA RATING: This institution is rated _____.

Summarize the major factors supporting the institution's rating. When illegal discrimination or discouragement has been identified and has affected the rating, the summary should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The summary should not mention any technical violations of the antidiscrimination laws.

The following table indicates the performance level of name of financial institution with respect to the lending, investment, and service tests. [Indicate the performance level under each criteria by marking an "X" in the appropriate row.]

PERFORMANCE LEVELS	<u>NAME OF FINANCIAL INSTITUTION</u>		
	PERFORMANCE TESTS		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

DESCRIPTION OF INSTITUTION:

Write a brief description of the institution. Include relevant information regarding the institution's holding company and affiliates, if any, the states and assessment areas served, the institution's ability to meet various credit needs based on its financial condition and size, product offerings, prior performance, legal impediments and other factors. Other information that may be important included total assets, asset/loan portfolio mix, primary business focus, branching network, and any merger or acquisition activity.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

Discuss the institution's overall CRA performance. The facts, data and analyses that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses and relevant information from the performance context factored into the overall institution rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

Write a paragraph about the institution's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) using the following guidelines.

When substantive violations involving illegal discrimination or discouragement are found by the FDIC or identified through self-assessment(s), state that substantive violations were found, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulations(s) violated, the extent of the violation(s) (e.g., widespread, or limited to a particular state, office, division, or subsidiary) and characterize management's responsiveness in acting upon the violation(s). Determine whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices.

If no substantive violations were found, state that no violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Even if discrimination has not been found, comments related to the institution's fair lending policies, procedures, training programs and internal assessment efforts may still be appropriate. If applicable, technical violations cited in the report of examination should be presented in general terms. Discuss whether management has [proposed/taken] steps that [have/would if implemented] address(ed) the technical violation(s).

MULTISTATE METROPOLITAN AREA

CRA RATING FOR (Name of Multistate Metropolitan Area, including State names)¹: _____

The Lending Test is rated: _____ **The Investment Test is rated:** _____

The Service Test is rated: _____

[Complete this section for each multistate metropolitan area where an institution has branches in two or more states within the multistate metropolitan area.]

Summarize the major factors supporting the institution's multistate metropolitan area rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

SCOPE OF EXAMINATION

Write a short description of the scope of the examination within the multistate MSA. Discuss how CRA activities in the multistate MSA were reviewed (using the examination procedures or through an analysis of available facts and data), and the time period covered in the review. When appropriate, you may also refer the reader to a chart similar to that included in Appendix A.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of MULTISTATE Metropolitan Area):

Describe the institution's operations within the multistate metropolitan area, including a description of each of the assessment area(s) that it serves within the multistate metropolitan area. Information that may be important includes: total assets; asset/loan portfolio mix; primary business focus; branching network; and any merger or acquisition activity. For each of the assessment areas served, include key information such as the number of branches within the assessment area and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the examination procedures. Other information that may be important includes population trends, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are not reviewed using the examination procedures.

¹This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained within the multistate metropolitan area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of Multistate Metropolitan Area)*:

Discuss the institution's CRA performance within the multistate metropolitan area, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the rating. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed without using the examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed without using the examination procedures is consistent with the institution's record in assessment areas reviewed using the examination procedures in the multistate metropolitan area. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

STATE

CRA RATING FOR (Name of STATE)²: _____

The Lending Test is rated:_____ **The Investment Test is rated:**_____

The Service Test is rated:_____

[Complete for each state in which an institution has branches if the institution has branches in two or more states. For an institution that has branches in only one state, complete the Metropolitan Area and Non-Metropolitan Statewide Area presentations only for that state, as applicable in light of the location of the branches.]

Summarize the major factors supporting the institution's state rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

SCOPE OF EXAMINATION

Write a short description of the scope of the examination within the state. Discuss how CRA activities in the state were reviewed (which MSAs or non-metropolitan statewide areas included assessment areas that were reviewed using the examination procedures and which MSAs were reviewed through an analysis of available facts and data), and the time period covered in the review. When appropriate, you may also refer the reader to a chart similar to that included in Appendix A.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of STATE):

Describe the institution's operations within the state, including a description of the assessment area(s) served. Information that may be important includes: total statewide assets; asset/loan portfolio mix; primary business focus; branching network; any merger or acquisition activity; and a brief description of the Metropolitan areas, nonmetropolitan areas, and assessment areas served within the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (Name of STATE):

Discuss the institution's CRA performance within the state. The facts, data and analyses that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

²For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

METROPOLITAN AREAS

(for metropolitan areas with some or all assessment areas reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN *(Name of Metropolitan area and State)*:

Describe the institution's operations within the metropolitan area, including a description of each of the assessment area(s) that it serves within the metropolitan area. Information that may be important includes: the number of branches within the assessment areas and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the examination procedures. Other information that may be important includes population trends, income levels, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are not reviewed using the examination procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of Metropolitan area and State)*:

Discuss the institution's CRA performance within the metropolitan area, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the rating. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed without using the examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed without using the examination procedures is consistent with the institution's record in assessment areas reviewed using the examination procedures in the metropolitan area. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

METROPOLITAN AREAS

(for each metropolitan area where no assessment areas were reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN (*Name of Metropolitan area and State*):

Describe the institution's operations within the metropolitan area, including a description of each of the assessment area(s) that it serves within the metropolitan area. Include key information such as the number of branches within the assessment areas and the number of individuals and geographies in each income category.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (*Name of Metropolitan area and State*):

Summarize the facts and data that were reviewed, including demographic information on the assessment areas and information on the institution's performance. Indicate whether the institution's performance in the assessment areas reviewed without using the examination procedures is consistent with the institution's record [overall/in the state], using one of the two following statements:

- a. The institution's [lending, investment, service] performance in the area is consistent with the institution's [lending, investment, service] performance overall [or in the state].
- b. The institution's [lending, investment, service] performance in the area [exceeds/ is below], the institution's [lending, investment, service] performance for the [institution/ state]; however, it does not change the conclusion/rating for the [institution/ state].

NONMETROPOLITAN STATEWIDE AREAS³

(if some or all of the assessment areas within the nonmetropolitan statewide area were reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN *(Name of Nonmetropolitan Area and State)*:

Describe the institution's operations within the nonmetropolitan statewide area, including a description of each of the assessment area(s) that it serves within the nonmetropolitan statewide area. Information that may be important includes the number of branches within the assessment areas and the number of individuals and geographies in each income category. Indicate how many of those assessment areas were reviewed using the examination procedures. Other information that may be important includes population trends, income levels, type and condition of housing stock, available employment, and general business activity. Also include a summary of any credit needs identified and particular lending opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Typically, more detailed information will be presented for assessment areas reviewed using the examination procedures. Charts and tables may be used to effectively present information as appropriate, particularly for assessment areas that are not reviewed using the examination procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of Nonmetropolitan Statewide Area)*:

Discuss the institution's CRA performance within the nonmetropolitan statewide area. The facts, data and analyses that were used to form a conclusion should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of each of the performance test analyses factored into the conclusions for the non-metropolitan statewide area. Support your conclusions with an analysis of facts and data, such as the number and volume of loans and investments, by type, across geographies and borrower categories in the assessment areas reviewed using the examination procedures. In addition, support your conclusions with a discussion of facts and data for assessment areas reviewed without using the examination procedures when appropriate. Indicate whether the institution's performance in the assessment areas reviewed without using the examination procedures is consistent with the institution's record in assessment areas reviewed using the examination procedures in the nonmetropolitan statewide area. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

³The discussion of an institution's CRA performance within a nonmetropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a non-metropolitan statewide area for intrastate banks that have branches in metropolitan and non-metropolitan areas is optional because the performance in the non-metropolitan areas has been reviewed and discussed in the overall evaluation of the institution. Examiners may wish to discuss in greater detail, however, the assessment areas within non-metropolitan areas that were reviewed using the examination procedures for intrastate banks with branches in metropolitan and non-metropolitan areas, or for intrastate banks with branches only in non-metropolitan areas .

NONMETROPOLITAN STATEWIDE AREAS⁴

(if none of the assessment areas within the nonmetropolitan statewide area were reviewed using the examination procedures)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN *(Name of Nonmetropolitan Area and State)*:

Describe the institution's operations within the non-metropolitan statewide area, including a description of each of the assessment area(s) that it serves. Include key information such as the number of branches within each assessment area and the number of individuals and geographies in each income category.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of Nonmetropolitan Statewide Area)*:

Summarize the facts and data that were reviewed, including demographic information on the assessment areas and information on the institution's performance. Indicate whether the institution's performance in the assessment areas reviewed without using the examination procedures is consistent with the institution's record [overall/in the state], using one of the two following statements:

- a. The institution's [lending, investment, service] performance in the area is consistent with the institution's [lending, investment, service] performance overall [or in the state].
- b. The institution's [lending, investment, service] performance in the area [exceeds/ is below], the institution's [lending, investment, service] performance for the [institution/ state]; however, it does not change the conclusion/rating for the [institution/ state].

⁴The discussion of an institution's CRA performance within a nonmetropolitan statewide area is only required for institutions with branches in two or more states. A separate discussion of CRA performance within a non-metropolitan statewide area for intrastate banks that have branches in metropolitan and nonmetropolitan areas is optional. Examiners may wish to discuss in greater detail, however, the assessment areas within the nonmetropolitan areas that were reviewed using the examination procedures for intrastate banks with branches in metropolitan and nonmetropolitan areas, or for intrastate banks with branches only in nonmetropolitan areas.

APPENDIX A**SCOPE OF EXAMINATION**

Write a short description of the scope of the examination. At a minimum, discuss the specific lending products reviewed, the names of (any) affiliates reviewed and their corresponding lending products, the institution's assessment areas and whether its activities in the assessment areas were reviewed using the examination procedures, and the time period covered in the review.

Large institutions with multiple assessment areas or affiliates subject to examination may warrant the use of charts that convey information regarding the scope of the examination. The following chart may be used as a supplement to the discussion of the scope or in lieu thereof.

SCOPE OF EXAMINATION [SAMPLE] [Note: Example provided for clarity]			
TIME PERIOD REVIEWED		1/1/95 TO 6/30/96	
FINANCIAL INSTITUTION XYZ State Bank, Grand Rapids, MI			PRODUCTS REVIEWED Small Business Small Farm Consumer Unsecured
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
XYZ Mortgage Company	Bank subsidiary		Mortgage loans
XYZ Community Investment Corporation	Holding company subsidiary		Investments
XYZ Credit Card Corporation	Holding company subsidiary		Credit Cards

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED⁵	OTHER INFORMATION
ILLINOIS MSA 0008 Decatur Adams County Non-MSA rural Illinois	 On - site Off - site On - site		Mortgage loans not offered in non-MSA rural areas.
MICHIGAN MSA 0001 Grand Rapids City of Marcellus Non-MSA rural Michigan	 On - site On - site Off - site		The scope of examination for non-MSA rural Michigan branches, encompasses activities for the past six months, coinciding with their acquisition date.

⁵There is a statutory requirement that the written evaluation of a multi-state institution's performance must list the individual branches examined in each state.

APPENDIX B**SUMMARY OF STATE AND MULTISTATE MSA RATINGS**

State or Multistate MSA Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating

Sample Wholesale and Limited-Purpose Institution Evaluation ***PUBLIC DISCLOSURE**

(Date of Evaluation)

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**Name of Depository Institution
Institution's Identification Number**

Address of Institution

Name of Supervisory Agency

Address of Supervisory Agency

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

***** This is a sample format created to reflect the requirements of the IBBEA for an institution operating in multiple assessment areas, in MSAs and in non-MSAs, in multiple states, including multistate MSAs. It will be adjusted, as appropriate, to reflect each institution's operations.

TABLE OF CONTENTS

I.	General Information	1
II.	Institution Rating.....	2
	a. Overall Rating	
	b. Discussion	
III.	Multistate MSA Rating	4
	a. Discussion of assessment areas within Multistate MSA examined using the examination procedures	
	b. Facts and data for Multistate MSA assessment areas not examined using the examination procedures	
IV.	State Rating.....	5
	a. MSA Analysis	6
	i. Conclusions	
	ii. Discussion of assessment areas within MSA examined using the examination procedures	
	iii. Facts and data for MSA not examined using the examination procedures	
	b. Non-Metropolitan Statewide Area Analysis	6
	i. Conclusions	
	ii. Discussions of non-Metropolitan Statewide assessment areas Examined using the examination procedures	
	iii. Facts and data for non-Metropolitan Statewide assessment areas Not examined using the examination procedures	
V.	Other Activities	9
VI.	Appendix	
	a. Scope of Examination.....	10
	b. Summary of State and Multistate MSA Ratings	12

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of (**Name of depository institution**) prepared by (**Name of agency**), the institution's supervisory agency, as of (**date of examination**). The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

INSTITUTION

INSTITUTION'S CRA RATING: This institution is rated _____.

Summarize the major factors supporting the institution's rating. When illegal discrimination or discouragement has been identified and has affected the rating, the summary should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The summary should not mention any technical violations of the antidiscrimination laws.

DESCRIPTION OF INSTITUTION:

Write a brief description of the institution. Include relevant information regarding the institution's holding company and affiliates, if any, the states and assessment areas served, the institution's ability to meet various credit needs based on its:

- Financial condition and size
- Product offerings
- Prior performance
- Legal impediments
- Other factors

Other information that may be important includes:

- Total assets
- Asset/loan portfolio mix
- Primary business focus
- Branch network
- Any merger or acquisition activity

CONCLUSIONS WITH RESPECT TO PERFORMANCE:

Discuss the institution's overall CRA performance. The facts, data and analyses that were used to determine the overall rating should be reflected in the narrative, including institution strengths and areas for improvement.

The narrative should clearly demonstrate how the analyses of each of the performance criteria, and relevant information from the performance context, factored into the overall institution rating. Discuss what effect, if any, community development activities outside of the assessment area(s) and the broader statewide or regional area(s) that includes the institution's assessment area(s) may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

Write a paragraph about the institution's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) using the following guidelines.

When substantive violations involving illegal discrimination or discouragement are found by the FDIC or identified through self-assessment(s), state that substantive violations were found, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulations(s) violated, the extent of the violation(s) (for example, widespread, or limited to a particular state, office, division, or subsidiary) and characterize management's responsiveness in acting upon the violation(s). Determine whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices.

If no substantive violations were found, state that no violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Even if discrimination has not been found, comments related to the institution's fair lending policies, procedures, training programs and internal assessment efforts may still be appropriate. If applicable, technical violations cited in the report of examination should be presented in general terms.

MULTISTATE MSA

CRA RATING FOR (Name of MULTISTATE MSA): _____

[If the institution has branches in two or more states within a multistate MSA, complete this section for each multistate MSA.]

Summarize the major factors supporting the institution's multistate MSA rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of MULTISTATE MSA):

Describe the institution's operations within the multistate MSA and the assessment area(s) that it serves.

CONCLUSIONS WITH RESPECT TO COMMUNITY DEVELOPMENT TEST IN (Name of MULTISTATE MSA):

Discuss the institution's CRA performance within the multistate MSA. The facts, data and analyses that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the results of the community development test analysis, as well as the institution's record in assessment areas not examined on-site (located in the multistate MSA), factored into the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institution's assessment area(s) are smaller than the boundaries of the multistate MSA, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

STATE

CRA RATING FOR (Name of STATE): _____

[If the institution has branches in more than one state, complete this section for each state. Otherwise, complete the Metropolitan Statistical Area and Non-Metropolitan Statewide Area presentations only, as applicable.]

Summarize the major factors supporting the institution's state rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN (Name of STATE):

Describe the institution's operations within the state and the assessment area(s) that it serves. Information that may be important includes:

- Total statewide assets
- Asset/loan portfolio mix
- Primary business focus
- Branch network
- Any merger or acquisition activity
- A brief description of the assessment areas within the state

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (Name of STATE):

Discuss the institution's CRA performance within the state. The facts, data and analyses that were used to form a conclusion about the rating should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the analyses of the performance criteria factored into the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

METROPOLITAN STATISTICAL AREAS

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of MSA)*:

Discuss the institution's CRA performance within the metropolitan statistical area. The facts, data and analyses that were used to form a conclusion should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the analyses of the performance criteria, as well as the institution's record in assessment areas not examined on-site (located in the MSA), factored into the MSA conclusion. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institutions assessment area(s) are smaller than the boundaries of the MSA, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

NON-METROPOLITAN STATEWIDE AREAS

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN *(Name of NON-METROPOLITAN STATEWIDE AREA)*:

Discuss the institution's CRA performance within the non-metropolitan statewide area. The facts, data and analyses that were used to form a conclusion should be reflected in the narrative, including institution strengths and areas for improvement. The narrative should clearly demonstrate how the analyses of the performance criteria, as well as the institution's record in assessment areas not examined on-site (located in the non-metropolitan statewide area), factored into the conclusion for the non-metropolitan statewide area. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

A discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

ASSESSMENT AREA

(for each assessment area examined using the examination procedures)

Charts or tables may be useful in depicting information throughout the assessment area presentation.

SUMMARY OF INSTITUTION'S OPERATIONS IN *(Name of ASSESSMENT AREA)*:

Summarize the institution's operations in the assessment area (such as office locations/product offerings).

DESCRIPTION OF *(Name of ASSESSMENT AREA)*:

Describe the assessment area (including demographic information such as population trends, income levels, type and condition of housing stock, employment information, and general business activity). Also include a summary of any particular community development opportunities which were noted. Discuss, if appropriate, the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation.

DISCUSSION OF PERFORMANCE TESTS IN *(Name of ASSESSMENT AREA)*:

Summarize the institution's CRA performance in the assessment area and broader statewide and regional area. Include supporting facts and data, such as the number, volume, and types of community development loans, qualified investments, and community development services. The narrative should demonstrate how each of the performance criteria and relevant information from the performance context, factored into the analysis.

ASSESSMENT AREA (or AREA REVIEWED)

For those assessment areas where an examination was not conducted: (multiple assessment areas within the same multistate MSA, MSA, or non-metropolitan statewide area and not examined may be combined into one presentation.)

Charts or tables may be useful in depicting information throughout the presentation.

SUMMARY OF INSTITUTION'S OPERATIONS IN (Name of ASSESSMENT AREA/AREA REVIEWED):

Summarize the institution's operations in the area reviewed (such as office locations/product offerings).

DESCRIPTION OF (Name of ASSESSMENT AREA/AREA REVIEWED):

Describe the area reviewed (including population, income levels, type and condition of housing stock, employment information, and general business activity).

DISCUSSION OF PERFORMANCE IN (Name of ASSESSMENT AREA/AREA REVIEWED):

Summarize the facts and data that were reviewed and indicate whether the institution's performance in the area reviewed is consistent with the institution's record in the multistate MSA, MSA, or non-metropolitan statewide area.

OTHER ACTIVITIES

If a wholesale or limited-purpose institution has adequately addressed the needs of its assessment area(s), qualified investments, community development loans, or community development services that benefit areas outside of the institution's assessment area(s) and the broader statewide or regional area(s) that includes the institution's assessment area(s) may be considered. If the activities considered were not sufficient to raise the rating of the institution from an overall satisfactory to an outstanding, this section need only contain a statement that other activities were considered but did not affect the overall rating of the institution.

Charts or tables may be useful in depicting information throughout the presentation.

SUMMARY OF INSTITUTION'S OTHER COMMUNITY DEVELOPMENT ACTIVITIES

Summarize the institution's community development activities outside its assessment area(s) and the broader statewide or regional area(s) that includes the institution's assessment area(s). Include number, volume, and types of community development loans, qualified investments, and community development services.

DISCUSSION OF PERFORMANCE IN OTHER COMMUNITY DEVELOPMENT ACTIVITIES

Summarize the institution's performance in other community development activities. The narrative should demonstrate how these activities influenced the overall rating for the institution.

EXAMPLE "A" – WHOLESALE AND LIMITED-PURPOSE INSTITUTION**SCOPE OF EXAMINATION**

Write a short description of the scope of the examination. At a minimum, discuss the specific products reviewed, the names of (any) affiliates reviewed and their corresponding products, the institution's assessment areas and whether its activities in the assessment areas were reviewed using the examination procedures, and the time period covered in the review.

Charts that illustrate the scope of the examination may be useful for large institutions with multiple assessment areas or institution's that use data from their affiliates. Charts, such as the ones below, may be used as a supplement to the discussion of the scope or in lieu thereof.

SCOPE OF EXAMINATION [SAMPLE]		
TIME PERIOD REVIEWED	1/1/95 TO 6/30/96	
FINANCIAL INSTITUTION XYZ National Bank, Wilmington, DE		PRODUCTS REVIEWED Community Development Investments Community Development Services
AFFILIATE	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
XYZ Corporation, Chicago, IL	Bank holding company	Qualified Investments
XYZ Investment Corporation, Chicago, IL	Holding company subsidiary	Qualified Investments

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION [SAMPLE]			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
DELAWARE MSA 11111 Wilmington	On - site		None
SOUTH DAKOTA MSA 1234 Sioux Falls	Off - site		Sioux Falls operations acquired in an acquisition dated 1/1/95 from ABCcorp. The scope includes only lending activity since that date.

EXAMPLE "B" – WHOLESALE AND LIMITED-PURPOSE INSTITUTION**SUMMARY OF STATE AND MULTISTATE MSA RATINGS**

State or Multistate MSA Name	State Rating

Sample Strategic Plan Institution Evaluation ***PUBLIC DISCLOSURE**

(Date of Evaluation)

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**Name of Depository Institution
Institution's Identification Number**

Address of Institution

Name of Supervisory Agency

Address of Supervisory Agency

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

***** This is a sample format created to reflect the requirements of the IBBEA for an institution operating in multiple assessment areas, in MSAs and in non-MSAs, in multiple states, including multistate MSAs. It will be adjusted, as appropriate, to reflect each institution's operations. The format assumes that the strategic plan covers the whole institution.

TABLE OF CONTENTS

I.	General Information	1
II.	Institution Rating	
a.	Overall Rating.....	2
b.	Discussion.....	2
III.	Multistate MSA Rating	3
a.	Discussion of assessment areas within Multistate MSA examined using the examination procedures	
b.	Facts and data for Multistate MSA assessment areas not examined using the examination procedures	
IV.	State Rating.....	4
a.	MSA Analysis	5
i.	Conclusions	
ii.	Discussion of assessment areas within MSA examined using the examination procedures	
iii.	Facts and data for MSA not examined using the examination procedures	
b.	Non-Metropolitan Statewide Area Analysis	5
i.	Conclusions	
ii.	Discussions of non-Metropolitan Statewide assessment areas Examined using the examination procedures	
iii.	Facts and data for non-Metropolitan Statewide assessment areas Not examined using the examination procedures	
V.	Appendix	
a.	Scope of Examination.....	8
b.	Summary of State and Multistate MSA Ratings	10

GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of (**Name of depository institution**) prepared by (**Name of agency**), the institution's supervisory agency, as of (**date of examination**). The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

This institution elected to be evaluated under the strategic plan option. The plan, approved by the agency, sets forth goals for satisfactory (and outstanding, if applicable) performance.

INSTITUTION

INSTITUTION'S CRA RATING: This institution is rated _____.

Summarize the major factors supporting the institution's rating. When illegal discrimination or discouragement has been identified and has affected the rating, the summary should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The summary should not mention any technical violations of the antidiscrimination laws.

CONCLUSIONS:

Summarize the facts, data and analyses that were used to determine the overall rating, based on the institution's plan goals and actual performance under the plan. The discussion should be organized broadly around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

Write a paragraph about the institution's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) using the following guidelines.

When substantive violations involving illegal discrimination or discouragement are found by the FDIC or identified through self-assessment(s), state that substantive violations were found, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulations(s) violated, the extent of the violation(s) (for example, widespread, or limited to a particular state, office, division, or subsidiary) and characterize management's responsiveness in acting upon the violation(s). Determine whether the institution has policies, procedures, training programs, internal assessment efforts, or other practices in place to prevent discriminatory or other illegal credit practices.

If no substantive violations were found, state that no violations of the substantive provisions of the antidiscrimination laws and regulations were identified. Even if discrimination has not been found, comments related to the institution's fair lending policies, procedures, training programs and internal assessment efforts may still be appropriate. If applicable, technical violations cited in the report of examination should be presented in general terms.

MULTISTATE MSA

CRA RATING FOR (Name of MULTISTATE MSA): _____

[If the institution has branches in two or more states within a multistate MSA, complete this section for each multistate MSA.]

Summarize the major factors supporting the institution's multistate MSA rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN (Name of MULTISTATE MSA):

Discuss the institution's CRA performance within the multistate MSA. The facts, data and analyses that were used to form a conclusion about the rating, as well as the institution's record in assessment areas in the multistate MSA that were not examined on-site, should be reflected in the narrative. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institution's assessment area(s) are smaller than the boundaries of the multistate MSA, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

STATE

CRA RATING FOR (Name of STATE): _____

[If the institution has branches in more than one state, complete this section for each state. Otherwise, complete the Metropolitan Statistical Area and Non-Metropolitan Statewide Area presentations only, as applicable.]

Summarize the major factors supporting the institution's state rating. When illegal discrimination or discouragement has been identified and has affected the rating, the conclusion should include a statement that the rating was influenced by violations of the substantive provisions of the antidiscrimination laws. The conclusion should not mention any technical violations of the antidiscrimination laws.

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN (Name of STATE):

Discuss the institution's CRA performance within the state. The facts, data and analyses that were used to form a conclusion about the rating, based on the institution's plan goals and actual performance under the plan, should be reflected in the narrative. The discussion should be organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

METROPOLITAN STATISTICAL AREAS

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN (*Name of MSA*):

Discuss the institution's CRA performance within the metropolitan statistical area. The facts, data and analyses that were used to form a conclusion, as well as the institution's record in assessment areas in the MSA that were not examined on-site, should be reflected in the narrative. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

If the institutions assessment area(s) are smaller than the boundaries of the MSA, a discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

NON-METROPOLITAN STATEWIDE AREAS

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN (*Name of NON-METROPOLITAN STATEWIDE AREA*):

Discuss the institution's CRA performance within the non-metropolitan statewide area. The facts, data and analyses that were used to form a conclusion, as well as the institution's record in assessment areas in the non-metropolitan statewide area that were not examined on-site, should be reflected in the narrative. The discussion should be based on the institution's plan goals and actual performance under the plan, and organized around the lending, investment and service goals, as applicable. If the institution has not substantially met its goals, discuss the effect, if any, changed circumstances may have on the rating. Charts and tables should be used whenever possible to summarize and effectively present the most critical or informative data used by the examiner in analyzing the institution's performance and reaching conclusions.

A discussion of the assessment areas examined should be included. Refer to the assessment area discussion, below.

ASSESSMENT AREA*(for each assessment area examined using the examination procedures)*

Charts or tables may be useful in depicting information throughout the assessment area presentation.

DISCUSSION OF PERFORMANCE IN (ASSESSMENT AREA NAME):

[Repeat for each assessment area.]

STRATEGIC PLAN GOALS AND ACTUAL PERFORMANCE FOR EDEN PRAIRIE AND DAVIS COUNTIES IN MINNESOTA TO OBTAIN SATISFACTORY RATING		
Sample	Strategic Plan Goal	Actual Performance
	1. \$1.5 million in small farm loans	1. \$1.32 million in loans
	2. \$2.0 million in loans to small businesses	2. \$3.7 million in loans.
	3. \$.5 million in loans to start-up businesses	3. \$.39 million in loans.
	4. Provide construction/permanent financing for 24-unit elderly low-income housing project	4. Construction line of credit approved for \$960,000. \$100,000 disbursed to date.

Summarize the facts, data and analyses that were used to form a conclusion on the institution's performance in the assessment area. This should compare and contrast the institution's plan goals for the assessment area and actual performance under the plan. Explain variances between the plan and actual results. If the institution has not substantially met its goals, discuss the performance context and its impact on the conclusion. The discussion should be organized around the lending, investment and service goals, as applicable. Use the chart below to supplement the written summary, and note whether the analysis was conducted on-site.

ASSESSMENT AREA (or AREA REVIEWED)

For those assessment areas that were not examined: (multiple assessment areas within the same multistate MSA, MSA, or non-metropolitan statewide area and not examined, may be combined into one presentation.)

Charts or tables may be useful in depicting information throughout the presentation.

DISCUSSION OF PERFORMANCE IN (Name of ASSESSMENT AREA/AREA REVIEWED):

Summarize the facts and data that were reviewed and indicate whether the institution's performance in the area reviewed is consistent with the institution's record in the multistate MSA, MSA, or non-metropolitan statewide area.

EXAMPLE "A" – STRATEGIC PLAN**SCOPE OF EXAMINATION**

Write a short description of the scope of the examination. At a minimum, discuss the specific products reviewed, the names of (any) affiliates reviewed and their corresponding products, the institution's assessment areas and whether its activities in the assessment areas were reviewed using the examination procedures, and the time period covered in the review.

Charts that illustrate the scope of the examination may be useful for large institutions with multiple assessment areas or institution's that use data from their affiliates. Charts, such as the ones below, may be used as a supplement to the discussion of the scope or in lieu thereof.

<div>SCOPE OF EXAMINATION</div> <div>[SAMPLE]</div> <div>[Note: Example provided for clarity]</div>			
TIME PERIOD REVIEWED		1/1/95 TO 6/30/96	
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
XYZ National Bank, Eden Prairie, MN			Small Business Small Farm
FINANCIAL INSTITUTION/ AFFILIATE	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
XYZ Bancorp, Blue Earth, MN	Holding Company		Investments
XYZ Community Development Corporation, Blue Earth, MN	Holding company subsidiary		Investments
XYZ Savings Bank, Blue Earth, MN	Thrift - Holding company subsidiary		Mortgage lending
XYZ National Bank, Tampa, FL	Holding company subsidiary		Credit Cards

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
MINNESOTA Davis County and Eden Prairie County (contiguous counties)	On - site		
FLORIDA City of Tampa	Off - site		

EXAMPLE "B" – STRATEGIC PLAN**SUMMARY OF STATE AND MULTISTATE MSA RATINGS**

State or Multistate MSA Name	State Rating



**FDIC LAW,
REGULATIONS,
& RELATED
ACTS**

Applicable Rules

Community Reinvestment Act of 1977, Volume 3, Page 8741

Part 345 – Community Reinvestment Act, Volume 2, Page 2781

**Advisory
Opinions**

None

**Statements of
Policy**

None

**DCA
MEMORANDA**

FFIEC Guidance for Small Bank Public Evaluations DCA-96-6456.5 (12/17/96)

CRA Rating Descriptions for Compliance Report DCA-96-6456.4 (10/28/96)

Guidance for Small Bank Public Evaluations DCA-96-6456.3 (10/26/96)

**FINANCIAL
INSTITUTION
LETTERS (FIL)**

Interagency Questions and Answers on the Revised Community Reinvestment Act Regulations FIL-30-97 (10/28/97)

Revised Regulation Implementing the Community Reinvestment Act (Part 345);
Revision to Regulation C (Includes the Preamble), Letter #35-95, dated 5/17/95

Technical Amendments to Correct and Clarify New Rules Implementing the
Community Reinvestment Act (Part 345), Letter #87-95, dated 12/27/95

OTHER

Large Bank Reference Guide, Issued 12/16/97
